

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SINGULARDTV, GMBH,

Plaintiff,

v.

ZACHARY LEBEAU and KIMBERLY JACKSON,

Defendants.

Case No. 1:21-cv-10130

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION FOR EXPEDITED DISCOVERY

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of SingularDTV GmbH's Motion for Expedited Discovery, the Proposed Document Requests attached as Exhibit A to this Motion, and any other argument or evidence that may be presented to the Court at a hearing on this matter, the undersigned will move this Court, before the Honorable Valerie E. Caproni, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, at a date and time to be determined by the Court, for an order granting SingularDTV leave to issue expedited discovery requests under Federal Rule of Civil Procedure 26(d)(1) and requiring:

- that Defendants produce all nonprivileged documents responsive to the requests in Exhibit A to the Motion within 7 days after entry of the order; and
- that Defendant LeBeau to appear for a deposition within 7 days after Defendants complete their document production.

Dated: New York, New York
February 25, 2022

Respectfully submitted,

/s/ Benjamin J. A. Sauter

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